

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

League of United Latin American Citizens –
Richmond Region Council 4164, Eliud
Bonilla, Luciania Freeman, Abby Jo
Gearhart, and Jeanne Rosen,

Plaintiffs,

v.

Public Interest Legal Foundation, an Indiana
Corporation,
and J. Christian Adams

Defendants.

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) Civil Action No. 1:18-cv-00423-LO-IDD
)
) **DECLARATION OF ANISA A. SOMANI**
) **IN SUPPORT OF PLAINTIFFS’**
) **OPPOSITION TO DEFENDANTS’**
) **MOTION TO DISMISS**
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I, Anisa A. Somani, declare as follows:

1. I am over 18 years of age. I am counsel for Plaintiffs League of United American Citizens—Richmond Region Council 4164, Eliud Bonilla, Luciania Freeman, Abby Jo Gearhart, and Jeanne Rosen (collectively, “Plaintiffs”) in this matter and have personal knowledge of the facts stated herein. If called upon, I could and would testify competently to them. I make this declaration for the purposes of transmitting certain documents to the Court in support of Plaintiffs’ Opposition to Defendants’ Motion to Dismiss.
2. Attached as Exhibit A is a true and correct copy of the Complaint filed in *United States v. North Carolina Rep. Party, et. al.*, 91-161-CIV-5-F, at *12 ¶¶ 43-44 (E.D.N.C Feb. 27, 1992). The copy attached was originally filed as an exhibit in *Democratic Nat. Comm. v. Republican Nat. Comm.*, 673 F.3d 192, 197 (3d Cir. 2012).

3. Attached as Exhibit B is a true and correct copy of the Consent Decree filed in *United States v. North Carolina Rep. Party, et. al.*, 91-161-CIV-5-F (E.D.N.C Feb. 27, 1992). The copy attached was originally filed as an exhibit in *Democratic Nat. Comm. v. Republican Nat. Comm.*, 673 F.3d 192, 197 (3d Cir. 2012).
4. Attached as Exhibit C is a true and correct copy of excerpts of Nicholas Katzenbach, Voting Rights, Part 1: Hearings on S. 1564 Before the Senate Comm. on the Judiciary, 89th Cong. 16 (1965).

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed this 12th day of June, 2018 in Washington, D.C.

By /s/ Anisa A. Somani
ANISA A. SOMANI (VSB No. 86103)